

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2006-327-WS**

IN RE:

Petition of the Office of Regulatory Staff	)	
Regarding Wyboo Plantation Utilities,	)	
Incorporated's Collection and Charging of	)	
<u>Unauthorized and Unapproved Rates</u>	)	<b>Office of Regulatory Staff's First Continuing Data Request</b>

**TO: WYBOO PLANTATION UTILITIES, INC. ("Wyboo" or "the Company")**

**INSTRUCTIONS**

The South Carolina Office of Regulatory Staff ("ORS") hereby requests, pursuant to 26 S.C. Code Regs. 103-833 (Supp. 2007), that the Company answer the following data requests in writing and under oath and serve the undersigned within twenty (20) days after service of this data request to ORS at 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, title, current address and telephone number of the person. When asked to identify or provide a document, "identify" and "provide" mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to,

statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings. As used in this data request, "address" means mailing address and business address.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS HEREIN REQUESTED:

- A. That all information shall be provided to the undersigned in the format as requested.
- B. That all responses to the requests below be labeled using the same numbers as used herein.
- C. That each of the enumerated data requests be reproduced at the beginning of each of the responses.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the data request in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.
- F. That all exhibits be reduced to 8 ½" x 11" format, where practical.
- G. That the requested information be bound in ring binders (loose leaf notebooks) or otherwise suitably bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each response be indicated.
- I. That the Company provide to ORS two copies of the responses to this data request as soon as possible but no later than twenty (20) days after service thereof.


- J. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- K. This data request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.

### **DATA REQUESTS**

- 1.1 Provide a detailed listing of the number of residential and commercial customers as of December 31, 2006, December 31, 2007, and July 1, 2008.
- 1.2 Provide a copy of the complete customer complaint log detailing all recorded customer service and billing complaints for the drinking water and sewer systems for the time period September 1, 2006 through July 1, 2008.
- 1.3 List, in chronological order, by year, by customer classification and by month, the total number of bills issued to customers during 2006 and 2007.
- 1.4 Provide the amount of accrued interest on customer deposits as of January 1, 2007 and December 31, 2007.
- 1.5 Provide information on the amount of deposits and interest returned to customers during 2006, 2007, and 2008 and any amount provided to the State of South Carolina pursuant to the Unclaimed Property Act.
- 1.6 Provide copies of cancelled checks written by Wyboo Plantation Utilities, Inc. showing the return of security deposits to customers in 2006, 2007, and 2008.
- 1.7 Provide a copy of the monthly bank statements showing the itemized security deposits/credits and withdrawals/debits in 2006, 2007, and 2008 for the bank account(s) used to manage the customer security deposits during the test year.
- 1.8 Provide copies of all existing and proposed special contracts binding Wyboo to a third party. Special contracts would include but not be limited to contracts for maintenance, construction agreements, rate agreements, system ownership, and loan agreements.
- 1.9 Submit detailed working papers breaking down the revenue of Wyboo Plantation Utilities, Inc. for 2007(i.e., ledger sheets, etc.). Include information about the schedule for the revenues generated that are separate from normal monthly charges.

- 1.10 Subsequent to the last rate case filing, has there been any change in the ownership of Wyboo Plantation Utilities, Inc.? This includes portions of the utility (i.e., Cedar Hill Mobile Home Park service area, etc.). If so, provide a listing of the owners of the Company.
- 1.11 If the response to Data Request 1.10 is affirmative, was the change in ownership approved by the Commission? If so, please identify the docket in which the Commission addressed the change of ownership of the Company?
- 1.12 Identify the current owners of Wyboo Plantation Utilities, Inc.
- 1.13 List the Wyboo Plantation Utilities, Inc. assets pledged for any loans.
- 1.14 Provide a copy of any and all loan agreements, its applicable amortization schedule, and any other relevant documentation.
- 1.15 Please provide a copy of the current performance bond required to be filed with the Commission. Identify the Commission criteria used to determine current bond amount.
- 1.16 Provide a copy of Wyboo Plantation Utilities, Inc.'s annual report filed with the Commission for 2007.
- 1.17 Are there any lawsuits pending against Wyboo Plantation Utilities, Inc.? If so, provide details of the lawsuits.
- 1.18 Are there any outstanding judgments against Wyboo Plantation Utilities, Inc.? If so, provide details of the judgments.
- 1.19 Provide copies of cancelled checks written by Wyboo Plantation Utilities, Inc. showing the return of any overcharges (i.e., tap fees, cut-on fees, cut-off fees, DHEC sewer fees, impact fees, etc.) paid by customers that was returned to customers in 2006, 2007, and 2008.

July 28, 2008

  
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Nanette S. Edwards, Esquire  
C. Lessie Hammonds, Esquire  
**South Carolina Office of Regulatory Staff**  
1441 Main Street, Suite 300  
Columbia, South Carolina 29201  
Phone: 803-737-0800  
Facsimile: 803-737-0895

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**CERTIFICATE OF SERVICE**

This is to certify that I, Pamela J. McMullan, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **OFFICE OF REGULATORY STAFF'S FIRST CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Mark S. Wrigley, CEO  
Wyboo Plantation Utilities, Incorporated  
Post Office 2099  
Sumter, SC, 29151

  
\_\_\_\_\_  
Pamela J. McMullan

July 28, 2008  
Columbia, South Carolina